IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF ALABAMA NORTHERN DIVISION

IN RE: **PHILLIP GOODWYN,** **DEBTOR,**	
SIMPLE PLEASURES, INC., **PLAINTIFF,**	**CIVIL CASE NUMBER** **2:06-CV-893-WKW**
V.	
V. RESTAURANTS, INC., **DEFENDANT.**	

MOTION TO EXTEND TIME TO FILE REPLY BRIEF

COMES NOW V Restaurants, Inc. and Vince Saele, Defendants in the above styled action, by and through their attorney of record, and moves this Honorable Court to extend the deadline for filling the reply brief by stating the following:

1. This Honorable Court set the deadline for filing a reply brief for December 20, 2006.

2. Due to the sudden illness of an associate attorney in the office our office was unable to prepare the reply brief and have it filed by December 20, 2006.

3. This absence caused an additional workload on the undersigned and the subject reply brief was not filed as required. The Defendant requests and an additional seven (7) days in which to file the reply brief.

WHEREFORE, the premises considered counsel for the Defendants prays this

Honorable Court will extend the deadline for filing a reply brief by seven (7) days.

RESPECTFULLY SUBMITTED this the 21st day of December, 2006.

/s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043)
ATTORNEY FOR DEFENDANTS, V
RESTAURANTS, INC AND VINCE
SAELE
560 S. MCDONOUGH ST., STE. A
MONTGOMERY, ALABAMA 36104
TELEPHONE   334-269-0269
FAX   334-323-5666

CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of this Motion to Extend Time to File reply Brief by electronic transmission or by placing a copy in the United States Mail with sufficient postage for first class delivery to the attorneys named below or parties if not represented by counsel.

DONE this the 21st day of December, 2006.

/s/ Daniel G. Hamm

DANIEL G. HAMM (HAM043)
ATTORNEY FOR DEFENDANTS, V
RESTAURANTS, INC AND VINCE
SAELE
560 S. MCDONOUGH ST.,STE.A
MONTGOMERY, ALABAMA 36104
TELEPHONE   334-269-0269
FAX   334-323-5666

Von Memory
James Day
469 S. McDonough Street
Montgomery, Alabama 36104